

Raytheon by James J. McCarthy

Barbee  
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1 was assembled on the first floor of Building 1.  
 2 Q. That's the only one you recognize on the  
 3 whole list?  
 4 A. It's the only one I recognize on the whole  
 5 list, because it was a tube I believe sold to the  
 6 FAA, and it was -- while some of the tubes on the  
 7 second floor, for example, of Building 1 were  
 8 inches in length and an inch or two in maximum  
 9 diameter, the PPA 200 tube was very large -- six,  
 10 eight, ten feet long -- and had to be handled on  
 11 pivoted and hinged racks to perform assembly  
 12 operations, so it stood out in my mind.  
 13 Q. Do the letters PPA stand for anything that  
 14 you know of?  
 15 A. I'm sure they do. I can't tell you what  
 16 they mean.  
 17 Q. Is that true of all the letters in these  
 18 boxes; QKA, QKW and so on?  
 19 A. I'm sure they mean something. I don't know  
 20 what they mean.  
 21 Q. When it says at the bottom of this, this  
 22 page that tubes containing this material must be  
 23 marked in accordance with the directive contained  
 24 in Standard Number 373066 dash 130, does that mean

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1 A. The policies and procedures in general that  
 2 you've presented here in this deposition, many of  
 3 those are microwave and power tube division  
 4 policies and procedures, and to the extent and if  
 5 such materials were used at Machlett, those  
 6 policies and procedures would have applied in those  
 7 date -- time frames.  
 8 Q. Do you know if Machlett worked with any  
 9 pure beryllium metal?  
 10 A. I don't.  
 11 Q. Was there any plant in the microwave and  
 12 power tube division that did work with beryllium  
 13 metal?  
 14 A. I don't recall ever encountering it in my  
 15 time at Raytheon, nor do I recall ever seeing any  
 16 document that specifically spelled out metallic  
 17 beryllium, elemental beryllium as an actual  
 18 material in use.  
 19 MR. UBERSAX: Mark that as the next  
 20 exhibit, please.  
 21 (Exhibit 13 marked for identification.)  
 22 VIDEO OPERATOR: This marks the end of  
 23 videotape number two in the Deposition of James  
 24 McCarthy. Going off the record, 2:02 p.m.

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1 that they must be tagged with the red tag warning  
 2 about beryllium -- beryllium oxide?  
 3 A. I don't think so.  
 4 Q. What do you think it means?  
 5 A. I think it means that the final product  
 6 tube must have a marking on it to indicate that it  
 7 contains a beryllium or beryllium compound just to  
 8 identify its content. That's how I would read it.  
 9 Q. What is Machlett Laboratories?  
 10 A. Machlett Laboratories, I believe is the  
 11 pronunciation, was a Raytheon facility located in  
 12 Connecticut. It was closed, I believe, before I  
 13 got to Waltham and may have been closed before I  
 14 even joined Raytheon. It was at one time, I  
 15 understand, a -- an operating facility of the  
 16 Raytheon Company Microwave and Power Tube Division.  
 17 Q. Did the Machlett facility work with  
 18 beryllium-containing parts?  
 19 A. I don't have any direct personal knowledge  
 20 of that.  
 21 Q. Did you ever see any Raytheon policies or  
 22 procedures that related to the handling of  
 23 beryllium or beryllium compounds at the Machlett  
 24 facility?

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1 (Off the record.)  
 2 VIDEO OPERATOR: This marks the  
 3 beginning of videotape number three in the  
 4 Deposition of James McCarthy. On the record, 2:03  
 5 p.m.  
 6 Q. (BY MR. UBERSAX) We've marked Exhibit 13,  
 7 RAY 1509 to 1512. Do you recognize that document,  
 8 sir?  
 9 A. I don't think I've ever seen this document  
 10 before. It appears to be a Machlett-labeled  
 11 document titled rules for personal hygiene program,  
 12 metal processing department dash beryllium, and it  
 13 has several dates on it, the earliest of which is  
 14 1960 something. I can't read it because the copy  
 15 is bad.  
 16 Q. Did the Machlett facility have its own  
 17 rules for handling beryllium?  
 18 A. I don't know.  
 19 (Exhibit 14 marked for identification.)  
 20 Q. Exhibit 14 is RAY 1496 to 97. Do you  
 21 recognize Exhibit 14?  
 22 A. Yes.  
 23 Q. Can you tell us what that is, please?  
 24 A. It's an internal Raytheon memo from Kerry

40 (Pages 154 to 157)

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